

## VIA ECF

The Honorable Analisa Torres United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

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Re: United States v. Ayeni and Solomon, 23 Cr. 274 (AT)

Dear Judge Torres:

This letter regards my representation of the above-captioned defendant, Mr. Jameel Solomon, who I was appointed to represent in June 2023.

Because Mr. Solomon's initial bail conditions permit travel within the Southern District of New York and the Eastern District of New York but not the District of New Jersey, I write to respectfully request that the Court temporarily modify Mr. Solomon's bail conditions such that he be permitted to travel to Old Bridge, NJ on September 4, 2023 from 8:00 am to 10:00 pm. The purpose of this travel is for Mr. Solomon to attend a Labor Day gathering, at an address communicated to both Pretrial Services and the government. He plans to return home at the end of the day.

The government, through AUSA Elizabeth Daniels, informed me it deferred to Pretrial Services regarding this request. Unfortunately, my office has been unsuccessful at reaching Pretrial Services Officer Ashley L. Cosme. However, at this stage, I am not aware of any violations of Pretrial's requests on Mr. Solomon's behalf. Additionally, Mr. Solomon made a day-long trip to this same residence to spend time with family on July 4, 2023, without incident.

Thank you for the Court's consideration.

Respectfully submitted,

Aaron Mysliwiec

Attorney for Jameel Solomon

GRANTED.

SO ORDERED.

Dated: September 1, 2023

New York, New York

ANALISA TORRES United States District Judge